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Counsel for Plaintiff and the Putative Class

**IN THE UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

NICOLAS WOOD, individually and on behalf  
of all others similarly situated,

PLAINTIFF,

vs.

BBG COMMUNICATIONS, INC., BBG  
GLOBAL AG, and BBG HOLDINGS, LTD.,

DEFENDANTS.

CASE NO.: '11CV0227 JM POR

CLASS ACTION

**NOTICE OF RELATED CASES**

Pursuant to CivLR 40.1(e) and 40.1(f), Plaintiff Nicolas Wood submits this Notice of Related Cases.

Currently pending in the United States District Court for the Southern District of California are two cases that Plaintiff Wood believes are related to the above-caption case:

1. *Evans v. BBG Communications, Inc.*, Case No. 3:10-CV-00542-H-NLS, filed on March 12, 2010 ("*Evans*"); and
2. *Sajfr, et al. v. BBG Communications, Inc.*, Case No. 3:10-CV-02341, filed on November 12, 2010 ("*Sajfr*").

1 Plaintiff believes *Evans* and *Sajfr* are related to the above-captioned case because they name  
2 the same defendant, BBG Communications, Inc. (“BBG”), concern similar operative facts and/or  
3 transactions, namely that BBG fails to disclose to consumers material facts (connection fees, per-  
4 minute rates, billing policies, etc.) prior to and at the time of selling its telecommunication  
5 services to consumers. In addition, the cases make overlapping legal claims under Cal. Business  
6 and Prof. Code § 17200 et seq., Cal. Civ. Code § 1750 et seq., as well as common law claims.

7 Plaintiff believes that assignment of the above-captioned case to the same judge that is  
8 currently presiding over the *Evans* and *Sajfr* cases would conserve the resources of both the  
9 parties and the Court.

10  
11 DATED: February 2, 2011

EPPSTEINER & FIORICA ATTORNEYS, LLP

12  
13 By: /s/ Stuart M. Eppsteiner  
14 Stuart M. Eppsteiner, Esq.  
Andrew J. Kubik, Esq.

15 Counsel for Plaintiffs and the Putative Class  
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**PROOF OF SERVICE**

**C.C. P. 1010.5, 1010.6, 1010.2, 1013a (3)**

STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I am employed in the county of San Diego, State of California. I am over the age of 18 and not a party to the within action; my business address is: Eppsteiner & Fiorica Attorneys, LLP, 12555 High Bluff Drive, Suite 155, San Diego, CA 92130.

On **February 2, 2011**, I served the following document(s) described as:

**NOTICE OF RELATED CASES**

On interested parties, on the interested parties, as follows:

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**X** **(BY MAIL)** I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at San Diego, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

**X** **(Federal)** I declare under penalty of perjury under the laws of the state of California that the above is true and correct.

Dated: February 2, 2011

/s/ Lupe Suro Horn